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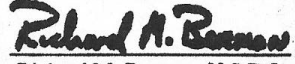
October 10, 2024

Via ECF Filing

Hon. Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street, Room 2220
New York, NY 10007

Re: SEC v. Gramins, et al., No. 15-cv-07045 (RMB)

Dear Judge Berman:

Application Granted.	
SO ORDERED: Date: 10/10/2024	 Richard M. Berman, U.S.D.J.

Plaintiff Securities and Exchange Commission (the “Commission”) and Defendant Michael A. Gramins (“Gramins”) respectfully submit this letter to ask the Court for an additional 30 days to file a proposed briefing schedule and to move to lift the existing stay. The parties seek this additional time to continue settlement discussions that could result in a resolution of this matter. While the parties have worked in good faith to negotiate, the parties believe that additional time will be required to reach a settlement in principle to propose for the Court’s consideration.

Accordingly, the parties hereby propose that the Court extend the deadline to November 12, 2024 for the parties to submit a proposed briefing schedule on the Commission’s proposed remedies along with a joint motion to lift the stay – or, in the alternative, for the parties to report a settlement in principle and to propose next steps to the Court.

Respectfully,



Rua M. Kelly
Senior Trial Counsel

Cc: Robert S. Frenchman (counsel to Defendant Michael Gramins)